

# **Exhibit 18**



## CORPORATE RESUME

Garden City Group, LLC (GCG) is the premier provider of legal administration services in the United States. For the past 30 years, law firms, corporations, government agencies, and courts have hired GCG to handle administrative challenges that arise in class actions, mass actions, bankruptcy proceedings, and other projects that require the coordination of outreach, communication, and the distribution of funds. GCG has administered some of the largest actions of all time, including those involving class action, bankruptcy and mass tort claims. GCG has administered over 3,000 settlements; mailed over 300 million notices; processed over 30 million claims; distributed over \$63 billion in compensation; and issued approximately 30 million checks. GCG has handled over 32 million calls and designed and launched hundreds of settlement websites. For five years in a row, GCG has been the highest ranked class action settlement administrator in the *New York Law Journal* survey of "Best Claims Administrator."

### SETTLEMENT VALUE

15 settlements valued > \$1 billion  
18 more settlements valued > \$500 million  
55 more settlements valued  $\geq$  \$100 million

### CLAIMS PROCESSED

39 settlements with 250,000 claims

### NOTICES DISSEMINATED

12 settlements with > 10,000,000 notices  
34 settlements with  $\geq$  2,000,000 notices  
20 settlements with  $\geq$  1,000,000 notices

## GCN'S PERSONNEL

GCN is the country's largest and most experienced settlement administrator with approximately 1,000 employees nationwide. We are the only administrator with more than 100 former attorneys on staff, many of whom have practiced class action, bankruptcy and mass tort law. GCN's Executive Team – David Isaac, GCN's Chief Executive Officer; Neil Zola, GCN's President; Karen Shaer, GCN's Senior Executive Vice President and General Counsel; and Jennifer Keough, GCN's Executive Vice President and Chief Operating Officer – are the most experienced in the industry.

The depth of experience of our current personnel can be measured both by their years administering settlements at GCN, and by their prior related endeavors, such as claims administration, litigation, brokerage, banking and information technology consulting. Our professionals have received extensive training over the years, both on the job, and in their undergraduate and graduate studies. Many have or have had licenses and certifications in disciplines that are germane to legal administrations such as CPA, CFA, Series 3, Series 4, and Series 7.

## QUALITY ASSURANCE



GCN leads our industry in Quality Assurance ("QA"), fraud detection/prevention, and privacy protection measures. In January 2013, GCN became the first and only administrator to obtain the American Institute of Certified Public Accountants (the "AICPA") Service Organizations Controls ("SOC") 2 Report. In that Report, an independent auditor attested that GCN's claims



administration process is designed to meet the rigorous Trust Services Criteria that the AICPA established for each of its five Trust Services Principles: Security, Availability, Processing Integrity, Confidentiality and Privacy. That Report attests that the controls in GCG's claims administration processes are designed to calculate legitimate claimants' recoveries by, among other things, contacting and communicating with as many potential claimants as possible, protecting the confidential information GCG receives from or on behalf of claimants, processing the proofs of claim GCG receives, and accepting as many proofs of claim as possible, but only when those proofs of claim satisfy the standards for recovery relevant to each settlement. No other administrator may tout this prestigious credential. Additionally, and equally significant, in each of the independent examinations of GCG administrations conducted in the past several years, GCG's settlement processing has been found to be at a minimum 99.97% accurate.

## **SYSTEMS**

GCG's Systems Department manages our proprietary technology, and develops state-of-the-art systems for our projects. Our technology allows us to provide efficient, cost-effective services to our clients, while protecting the security of confidential information. Our system is stalwart enough to house massive amounts of data, yet nimble enough to allow for a customized client portal that provides several different levels of access and security clearance for our clients to interact with that data on demand.

## **DATA SECURITY**

GCG's technology and data security is the most robust in the business. Our high security standards ensure that clients can rely upon GCG to protect the sensitive information they entrust to our care. We routinely work for major financial institutions that require us to complete very detailed and comprehensive questionnaires regarding our IT capability and security. Our data center in Dublin, Ohio, has been visited by numerous clients who have stress-tested our systems and who now identify GCG as a preferred provider. We also have worked for several cutting-edge technology companies and major corporations, who, as a prerequisite to hiring us have attempted to hack into our systems without success.

## **FRAUD PREVENTION**

GCG's fraud prevention and compliance program is anchored by our Senior Executive Vice President and General Counsel, Karen Shaer, and Tom Davis, Vice President, Operations, Compliance and Fraud Prevention, which ensures that GCG diligently protects our clients' privacy and the settlement funds entrusted to our care. All of our information systems are secure, password and firewall protected, and protected by other means. Working jointly with our partner financial institutions, GCG employs multi-tiered levels of security and fraud prevention to ensure the protection of a class' assets from fraud. GCG is also always in compliance with the Office of Foreign Asset Control (OFAC) and conducts searches on checks that it issues to ensure compliance with OFAC and other federal and state regulations. GCG partners with law enforcement agencies and financial service organizations to investigate and expose dishonest schemes before they have an opportunity to succeed.



## DIVERSITY & INCLUSION

GCG is the only administration firm in the country to have a formal, established Diversity and Inclusion program. As an Equal Opportunity/Affirmative Action Employer, diversity and inclusion are integral to both the success of our company and our ability to provide industry-leading services. GCG's commitment to embracing and respecting employee differences creates a diverse working environment enriching our offices nationally, contributing positively to our employees' work experience, and driving our productivity. GCG's company-wide Diversity & Inclusion program sets the standard within our industry for both the caliber of its leadership and the wide-ranging content of its programs and reach within our organization. Recognizing that the diversity of our employees extends far beyond race and gender, GCG's policies and practices set the standard in the legal administration industry for their recognition and inclusion of employees regardless of age, sexual orientation, veteran's status or disability.

## LOCATIONS

GCG's size and national scope ensure that experienced teams of professionals are always available to meet our clients' needs throughout the United States and abroad. With dual headquarters in New York and Seattle, GCG truly has a national footprint, with access to local employees and resources which are important for our clients. Our 60,000-square-foot call and processing center in Dublin, Ohio, incorporates state-of-the-art mail and claim processing facilities, and an industry leading Call Center team staffed with experienced call agents and supervisors to support the hundreds of active legal administration projects GCG handles at any given time.

## EXPERIENCE ADMINISTERING “MEGA-FUND” SETTLEMENTS

As the leading class action claims administrator, GCG has built its reputation and is most known for its work on large, complex administrations, some involving millions of claims. GCG has handled nearly 90 administrations with settlement values of more than \$100 million. Below is a summary discussion of just a few of these administrations.

*Gulf Coast Claims Facility:* GCG handled the administration of the \$20 billion fund established by BP for damages arising out of the Gulf oil spill.

- Mailed more than 550,000 claim packets and received nearly 1 million claims
- Designed official and secure website in multiple languages, which has had more than 1.2 billion website hits
- Handled more than 7 million calls (including more than 330,000 calls in one day) and 1 million emails
- Distributed payments to more than 225,000 claimants totaling in excess of \$6.5 billion
- Created (and continue to maintain) a database with more than 70 million records/images



*Deepwater Horizon Economic and Property Damage Settlement:* Class action settlement estimated at approximately \$10.3 billion.

- Launched 30,000 square foot Gulf Coast intake facility in 30-day period, with over 200 initial employees
- Recruited and trained more than 800 new employees for call center
- Mailed more than 1 million personalized notices to potential class members and their counsel
- Designed (and continue to maintain) official website in English, Spanish and Vietnamese
- Processed more than 24,000 "opt-out" requests on an expedited basis
- Distributed over \$5.7 billion and counting

*Indian Trust Settlement (Cobell v. Salazar):* The U.S. Department of Justice retained GCG to administer this landmark \$3.4 billion settlement – the largest settlement with the United States government in history and a matter of national import.

- Distributed notice materials to more than 700,000 individuals
- More than 2.5 million minutes of class member call time
- Provided informational video in 10 languages on website
- Assisted with extensive clean-up of a complicated and incomplete database, including conducting research to locate individuals and account holders
- Commenced distributions ahead of the Court-ordered schedule with nearly 80 percent of checks issued to date being cashed by the recipient in less than 20 days

*VisaCheck/MasterMoney Antitrust Litigation:* (\$3.05 billion settlement).

- Mailed notice to over 8 million potential class members and processed more than 800,000 claims
- Processed complex data from 85 sources including 200,000,000 transactions
- Handled hundreds of thousands of phone calls and tens of thousands of emails and correspondence
- Distributed nearly 2 million checks for total proceeds of approximately \$2.61 billion in seven separate distributions

*In re WorldCom Securities Litigation:* This \$6.15 billion settlement involved 14 separate settlements and four separate pools of settlement funds that resulted from settling different claims with different class periods asserted against different defendants.

- Distributed notice materials to nearly 4 million parties and processed nearly 1 million claims
- An independent audit determined GCG's processing and claim calculations over 99.97% accurate
- Provided nearly 70,000 potential class members with direct assistance from a live operator
- Distributed over 2.1 million checks